

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION

UNITED STATES OF AMERICA)	Criminal No: 1:16-632
)	
v.)	
)	
SUSAN SHERLOCK)	

MOTION FOR DOWNWARD DEPARTURE

NOW COMES the United States, by and through its undersigned attorney, and would respectfully make motion to the above-referenced court pursuant to § 5K1.1 of the United States Sentencing Guidelines and Title 18, United States Code, § 3553(e), that this Honorable Court depart downward from the applicable guidelines regarding the defendant, SUSAN SHERLOCK, by 3 levels. In support of such motion, the Government submits the following:

1. SUSAN SHERLOCK plead guilty to one count of racketeering conspiracy on February 28, 2017.
2. SUSAN SHERLOCK cooperated against her husband, Tommy Sherlock. Information was provided to the Government, that but for SUSAN SHERLOCK's cooperation and willingness to waive the spousal testimonial privilege and to cooperate against her husband that Mr. Sherlock would have proceeded to trial.
3. The information that SUSAN SHERLOCK provided concerned the fraud related to insurance, vehicle financing, and taxes.
4. It appears to the Government that SUSAN SHERLOCK was truthful in communications to law enforcement about her husband. Moreover, SUSAN SHERLOCK's assistance was substantial in the successful prosecution of her husband.

WHEREFORE, the government moves that this Honorable Court grant the Motion for Downward Departure as herein requested in the case of SUSAN SHERLOCK.

Respectfully submitted,

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